

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ROBERT G. DREWS,

Plaintiff,

vs.

AMERICAN AIRLINES, INC.,

Defendant.

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COMPLAINT

NOW COMES Plaintiff Robert G. Drews ("Plaintiff") by and through his attorney, Fred S. Findling, of Findling Law, PLC, and states as follows:

1. Plaintiff is a resident of the City of Armada, County of Macomb, and a citizen of the State of Michigan.
2. Defendant American Airlines, Inc., ("Defendant") is a Delaware Corporation, a citizen of the State of Delaware, and does business in the State of Michigan.
3. This cause of action arose in the City of Chicago, State of Illinois.
4. Jurisdiction is based on 28 USC Sec. 1332 (a) Diversity of Citizenship, the amount in controversy exceeds Seventy Five Thousand (\$75,000.00) Dollars, and it is otherwise within the jurisdiction of this Court.
5. This cause of action arose post filing of Chapter 11 proceedings of AMR Corporation and its affiliates, including this Defendant, on November 29, 2011, in the United States Bankruptcy Court for the Southern District of New York, Case No. 11-15463 (SHL), and is not under the jurisdiction of said Bankruptcy Court.

6. On or about January 27, 2012, at 9:55am (CST) Plaintiff was boarding Defendant's plane at a jet bridge at gate L2C at O'Hare Airport, in Chicago, Illinois, to travel to Bishop Airport in Flint, Michigan. Before boarding the plane, jet crews, employees of Defendant, had deiced the plane with a deicing solution, and/or ethylene glycol. While exiting the jet bridge, the ground crew spilled a lot of said deicing solution, and/or ethylene glycol, onto the floor of the jet bridge, causing the floor to become very slippery, and causing numerous passengers, including Plaintiff to slip and fall on the wet floor, severely injuring him.
7. Defendant had notice of the dangerous condition of the jet bridge caused by its cleaning crew.
8. Defendant had the ability and opportunity to correct the dangerous slippery condition of the jet bridge.
9. Defendant owed Plaintiff a duty to forewarn him of the imminent danger of boarding the plane and/or stop the boarding of the plane.
10. Defendant was negligent in its duty to correct the dangerous slippery condition of the jet bridge, and/or failed in its duty to forewarn Plaintiff of the dangers, and as a result Plaintiff sustained severe injuries from the slip and fall on the jet bridge.
11. As a direct and proximate result of Defendant's negligence as hereinbefore alleged, Plaintiff sustained serious severe and grievous injuries including but not limited to; a scapholunate dissociation of the right wrist, requiring surgery of a SLAC reconstruction, and acute carpal tunnel syndrome; an aggravation of a preexisting osteoarthritic right pelvic region of the thigh, requiring a total hip replacement in

the nature of a right arthroplasty; causing pain discomfort, disability, crippling effect, emotional distress, mental anxiety, and loss of the normal enjoyments of life. All of the above injuries, conditions, and sequelae are permanent, except those of a superficial nature.

12. As a direct and proximate result of the acts and/or omissions constituting negligence as hereinbefore set forth, described, and alleged, Plaintiff has been required to undergo extensive medical care and treatment, including hospitalization in an attempt to effectuate a cure for the injuries sustained and Plaintiff will, in the future, be required to undergo further medical care, surgery, treatment, and have future lost wages.

WHEREFORE, Plaintiff claims judgment against Defendant for whatever amount said Plaintiff is found to be entitled as determined by the trier of fact, together with interest, costs, and attorney fees.

Respectfully submitted,

FINDLING LAW, P.L.C.

/s/ Fred S. Findling  
Fred S. Findling (P13422)  
Attorney for Plaintiff  
414 W. Fifth Street  
Royal Oak, MI 48067-2543  
(248) 399-3300

Dated: January 31, 2013

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JURY DEMAND

NOW COMES, Plaintiff, Robert G. Drews, by and through his attorney, Fred S. Findling, P13422, and Findling Law, PLC, and hereby demands a trial by Jury in this matter.

Respectfully submitted,

FINDLING LAW, P.L.C.

/s/ Fred S. Findling

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Fred S. Findling (P13422)

Attorney for Plaintiff

414 W. Fifth Street

Royal Oak, MI 48067-2543

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Dated: January 31, 2013